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**June 30, 1995**

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**JUN 30 1995**

**VIA HAND DELIVERY**

**Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

**Dear Mr. Caton;**

**Transmitted herewith, on behalf of Dafter Community Broadcasters, is a Petition For Rule Making seeking the assignment of FM channel 233A at Dafter, Michigan, as that community's first local broadcast allotment.**

**Please contact the undersigned should you have any questions regarding this matter.**

**Very truly yours,**

**Dafter Community Broadcasters**

**By:**

**Jeffrey D. Southmayd**

**Its Attorney**

**Enclosures**

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BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In re Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Allotments ) RM-  
FM Broadcast Stations )  
(Dafter, Michigan) )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

PETITION FOR RULE MAKING

Dafter Community Broadcasters (hereafter "DCB"), by its undersigned counsel, and pursuant to the provisions of Section 1.401 of the Commission's Rules and Regulations, hereby respectfully requests that the Section 73.202(b) FM Table of Allotments be modified as follows:

	Channel No.	
Community	Present	Proposed
Dafter, Michigan	-----	233A

In support of this request, DCB respectfully submits the following for the consideration of the Commission.

1. Dafter, Michigan, is a township located in Chippewa County in the "upper peninsula" area of Michigan. Dafter is a census designated place in accordance with the U.S. Department of Commerce criteria and is listed in its directory of census

designated places.

2. The proposed FM assignment would result in the first local broadcast allocation to Dafter, Michigan. Accordingly, the subject proposal furthers the public interest goals of Section 307(b) of the Communications Act of 1934, as amended.

3. Attached hereto is an Engineering Statement prepared by DCB's engineering consultants, Lechman & Johnson, Inc. Table I in the Engineering Statement is a list of existing stations, applications and proposed rule makings of co-channel and adjacent channel assignments that could impact on the proposed Dafter FM allotment. Table I demonstrates that the proposed allotment can be made in full compliance with the criteria found in Section 73.208 of the Commission's Rules and Regulations. The Engineering Statement also demonstrates that the allotment can be made in full compliance with the coverage criteria found in Section 73.315(a) of the Commission's Rules and Regulations from the referenced coordinates of North Latitude: 46-27-50 West Longitude: 84-23-05.

4. In the event the Commission issues a notice of proposed rule making on this request, DCB will file comments in support thereof. In the event the FM Channel 233A allotment is made to Dafter, Michigan, DCB, or an affiliated entity, will file an application seeking a construction permit to utilize that allotment.

Wherefore, based on the foregoing, DCB respectfully requests the assignment of FM Channel 233A to Dafter, Michigan, as that community's first local FM allotment.

Respectfully submitted,

Dafter Community Broadcasters

By: 

Jeffrey D. Southmayd

Its Attorney

Southmayd & Miller  
1220 Nineteenth Street, N.W.  
Suite 400  
Washington, D.C. 20036  
(202) 331-4100

Date: June 30, 1995

## **DECLARATION**

### **ENGINEERING STATEMENT**

**PREPARED FOR  
DAFTER COMMUNITY BROADCASTERS  
DAFTER, MICHIGAN**

Thomas J. Johnson says that he is an engineer and Vice President of Lechman & Johnson, Inc., Telecommunications Consultants, with offices located at 16201 Trade Zone Avenue, Suite 106, Upper Marlboro, Maryland, and that his qualifications are a matter of record with the Federal Communications Commission.

That the firm of Lechman & Johnson, Inc. has been retained by Dafter Community Broadcasters to prepare this Engineering Statement in support of a Petition for Rule Making to amend the Table of FM Assignments, Section 73.202(b), to allocate Channel 233A to Dafter, Michigan. It is proposed to amend the Table of FM Assignments as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Dafter, Michigan	<u>Allocation</u>	<u>Allocation</u>
		233A

A channel study was made to determine whether a channel could be found which would comply with the Commission's minimum separation requirements of Section 73.207 of the Rules and Regulations. This study showed that Channel 233A would meet these separation requirements. The reference coordinates relied upon are as follows:

North Latitude: 46° 27' 50"  
West Longitude: 84° 23' 05"

Table I is a list of existing stations, applications, allocations and proposed rule makings of co-channel and adjacent channel assignments pertinent to allocating Channel 233A to Dafter, Michigan. The tabulation of distances shown in this Table were calculated by the methods prescribed in Section 73.208 of the Commission's Rules and Regulations, using the above reference point.

**LECHMAN & JOHNSON, INC.**

Declaration - Dafter Community Broadcasters  
Thomas J. Johnson  
Page Two

Section 73.315(a) of the FCC Rules and Regulations requires that the 70 dBu contour must encompass the boundaries of the principal community to be served. There is no terrain obstruction to the city of Dafter, Michigan. Therefore, the proposed operation will provide the requisite coverage to Dafter, Michigan in accordance with the provisions of Section 73.315 (a) & (b) of the FCC Rules and Regulations.

The township of Dafter, located within Chippewa County, Michigan has a 1990 population of 1,147.

Figure 1 is a map which shows the community of license, the reference site and surrounding terrain features.

The results of these studies show that Channel 233A can be assigned to Dafter, Michigan consistent with the requirements of the Commission's Rules and Regulations.

I declare under penalty of perjury that the foregoing is true and correct.

LECHMAN & JOHNSON, INC.



Thomas J. Johnson  
Telecommunications Consultant  
June 13, 1995

**LECHMAN & JOHNSON, INC.**

**TABLE I**  
**SEPARATION STUDY**  
**PREPARED FOR**  
**DAFTER COMMUNITY BROADCASTERS**  
**DAFTER, MICHIGAN**

Channel 233A      046-27-50 / 084-23- 5      erp : 6.000 kw      eah : 100 m

Designation =====	Channel (MHz) =====	Pertinent Allocation or Authorized Station =====	Separation Actual =====	(Km) Required =====
1st Adjacent	232A ( 94.3)	WFGE, Mackinaw Cit, MI BLH-931001KA 045-43-59 / 084-38-22 3.00 kw / 58 m bearing from proposed = 193.68 deg	83.59  CLEAR (	72  11.59 km)
1st Adjacent	234C1 ( 94.7)	Gulliver, MI WINDOW OPEN, 045-59-35 / 086- 0-43 0.00 kw / 0 m bearing from proposed = 247.89 deg	136.01  CLEAR (	133  3.01 km)

Reference Coordinates  
N 46° 27' 50" / W 84° 23' 05"

JUNE 1995

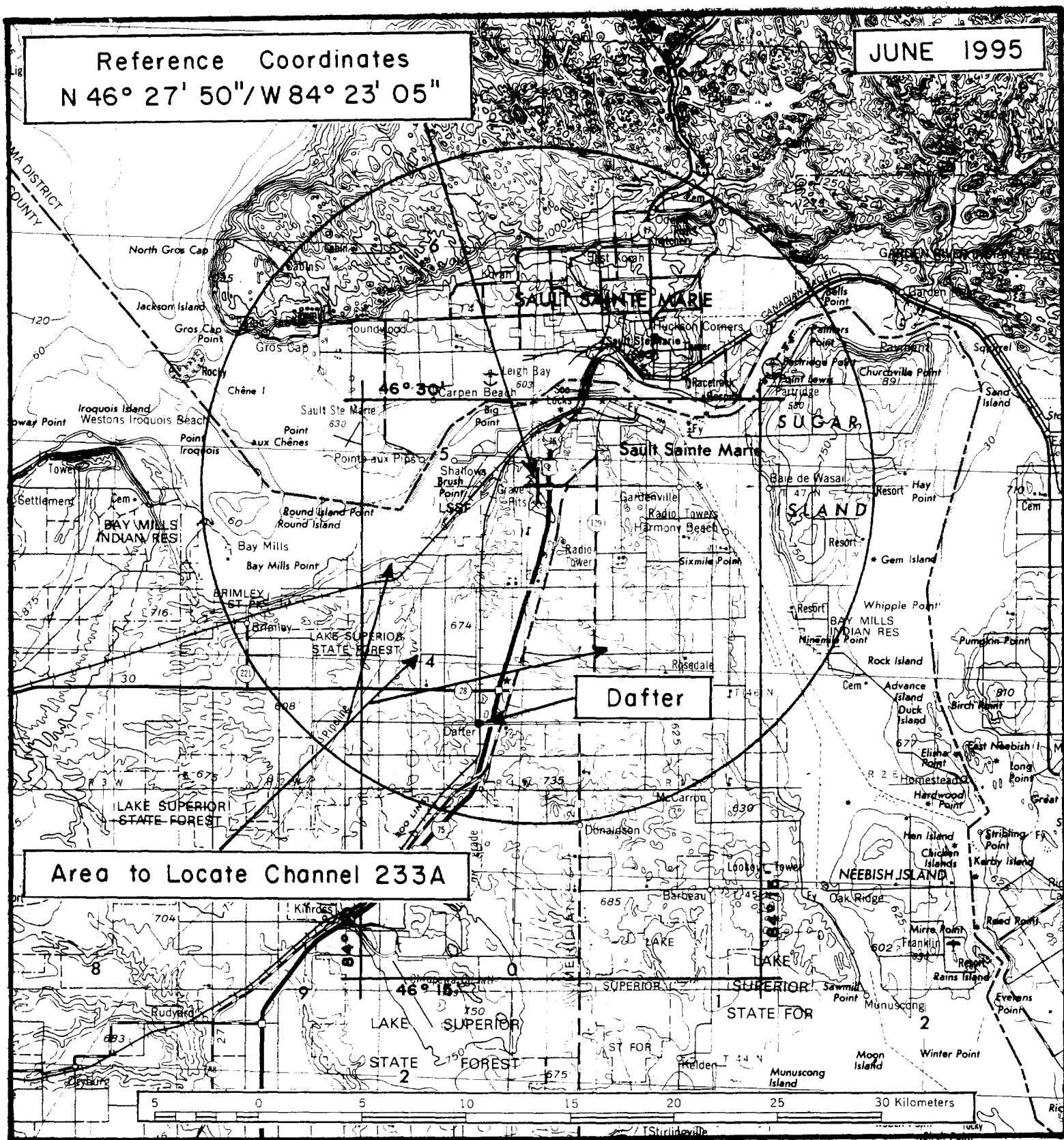


FIGURE 1

PREPARED FOR  
DAFTER COMMUNITY BROADCASTERS  
DAFTER, MICHIGAN

LECHMAN & JOHNSON, INC.  
TELECOMMUNICATIONS CONSULTANTS  
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